

1       **STIP**

2       ADAM L. GILL, ESQ.  
3       Nevada State Bar No. 11575  
4       723 South 3rd Street  
5       Las Vegas, NV 89101  
6       P: (702) 750-1590  
7       F: (702) 548-6884  
8       Attorney for Defendant  
9       Francisco Mares

10                   **UNITED STATES DISTRICT COURT**

11                   **DISTRICT OF NEVADA**

12       UNITED STATES OF AMERICA,  
13                   Plaintiff,  
14       vs.  
15       FRANCISCO MARES,  
16                   Defendant,

17                   Case No: 2:20-cr-00018-JCM-EJY-2

18                   **STIPULATION TO CONTINUE  
19                   REVOCATION OF PRETRIAL RELEASE**

20                   IT IS HEREBY STIPULATED AND AGREED, by and between Defendant FRANCISCO  
21                   MARES, by and through his counsel, ADAM L. GILL, ESQ. and the United States of America, by  
22                   its counsel, ALLISON REESE, ESQ., Assistant U.S. Attorney, that the Revocation of Pretrial  
23                   Release in the above-captioned matter currently set for January 26, 2022 at 10:30 a.m. be continued  
24                   to February 2, 2022.

25                   This stipulation is entered for the following reasons:

- 26                   1. Counsel needs additional time to prepare sentencing mitigation materials.
- 27                   2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
- 28                   3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated she agrees to the  
continuance.
- 29                   4. Additionally, denial of this request for continuance could result in a miscarriage of  
justice.
- 30                   5. In addition, the continuance sought is not for delay and the ends of justice are in fact

1 served by the granting of such continuance which outweigh any interest of the public  
2 and the defendant in proceeding with sentencing on January 26, 2022.

3 DATED this 25th day of January, 2022.  
4

5 /s/ Adam L. Gill  
6 Adam L. Gill, Esq.  
Counsel for Defendant  
Francisco Mares  
7

8 /s/ Allison Reese  
9 Allison Reese, Esq.  
Attorney for the United States  
Assistant United States Attorney  
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1           **FOF**

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10           **UNITED STATES DISTRICT COURT**

11           **DISTRICT OF NEVADA**

12           UNITED STATES OF AMERICA,

13           Plaintiff,

14           vs.

15           FRANCISCO MARES

16           Defendant.

17           Case No: 2:20-cr-00018-JCM-EJY-2

18           **ORDER**

19           **FINDINGS OF FACT**

20           Based on the stipulation of Counsel, and good cause appearing, the Court finds that:

- 21           1. Counsel needs additional time to prepare sentencing mitigation materials.
- 22           2. Mr. Gill has spoken with Mr. Mares and he agrees with this continuance.
- 23           3. Mr. Gill has spoken to Ms. Reese and Ms. Reese has indicated she agrees to the
- 24           continuance.
- 25           4. Additionally, denial of this request for continuance could result in a miscarriage of
- 26           justice.
- 27           5. In addition, the continuance sought is not for delay and the ends of justice are in fact
- 28           served by the granting of such continuance which outweigh any interest of the public
- and the defendant in proceeding with sentencing on January 26, 2022.

## ORDER

IT IS HEREBY ORDERED, that the Sentencing hearing, currently scheduled for January 26, 2022, at the hour of 10:00 a.m., be vacated and continued to **February 2, 2022**, at the hour of **10:30 a.m.**

Dated January 26, 2022.

**UNITED STATES DISTRICT JUDGE**